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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 CHRISTINA CANTU and REBEKAH  
16 SVINNING, on behalf of themselves and all  
17 others similarly situated,

18 v.  
19 Plaintiffs,

20 THOMPSON MICHIE ASSOCIATES, LLC, a  
21 foreign limited liability company; TM  
22 EQUITIES INC., f/k/a THOMPSON MICHIE  
23 ASSOCIATES, INC., a foreign corporation;  
24 DOES 1 through 50, inclusive,

25 Defendants.

26 Case No. 2:24-cv-00908-APG-DJA

27 **STIPULATION AND ORDER  
EXTENDING DEADLINE FOR  
DEFENDANT TM EQUITIES INC. TO  
RESPOND TO CLASS AND  
COLLECTIVE ACTION COMPLAINT  
(FIRST REQUEST)**

28 **STIPULATION**

29 Plaintiffs CHRISTINA CANTU and REBEKAH SVINNING, on behalf of themselves  
30 and all others similarly situated (“Plaintiffs”) and Defendant TM EQUITIES INC. (“Defendant”),  
31 by and through their undersigned counsel of record, hereby stipulate and agree, pursuant to LR  
32 IA 6-1 and 6-2, as follows. This is the first request for the extension of this deadline.

33 1. Plaintiffs filed their Class & Collective Action Complaint and Individual  
34 Complaint on April 8, 2024 (“Complaint”). ECF No. 1-2, Ex. A.

35 2. Defendant was served with the Complaint on April 15, 2024. ECF No. 1-2, Ex. D.

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1       3.     Defendant Thompson Michie Associates, LLC removed this action to this Court  
2 on Tuesday, May 14, 2024. ECF No. 1.

3       4.     Defendant's response to the Complaint is due to be filed on Tuesday, May 21,  
4 2024 pursuant to Fed. R. Civ. P. 81(c)(2)(C).

5       5.     Defendant and Plaintiffs hereby agree to extend the deadline for Defendant to  
6 respond to the Complaint by one week, from May 21, 2024, to and including May 28, 2024.  
7 Defendant reserves all defenses and objections, and Defendant and Plaintiffs have agreed to a  
8 separate Tolling Agreement for the limited purpose of tolling the statute of limitations for absent  
9 class members with respect to FLSA claims in the Complaint, only, for the duration of the  
10 extension (resulting in a Tolling Period of one week, or seven calendar days).

11      6.     This Stipulation is made to accommodate pre-scheduled travel of Defendant's  
12 counsel and to allow Defendant to fully prepare its response to the Complaint, and not for the  
13 purpose of delay. Therefore, good cause exists to extend the deadline for Defendant's response  
14 to the Complaint.

15           IT IS SO STIPULATED.

16           Dated this 17th day of May, 2024.

17           **HOLLAND & HART LLP**

18           */s/ Sydney R. Gambee*  
19           Tyson C. Horrocks  
20           Sydney R. Gambee  
21           9555 Hillwood Drive, 2nd Floor  
22           Las Vegas, NV 89134

23           *Attorneys for Defendant TM Equities, Inc.*

17           **RAFI & ASSOCIATES, P.C.**

18           */s/ Jason Kuller*  
19           Jason Kuller (12244)  
20           Shay Digenan (16397)  
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22           Las Vegas, NV 89144

23           *Attorneys for Plaintiffs*

24           **ORDER**

25           **IT IS SO ORDERED.**



26           **UNITED STATES MAGISTRATE JUDGE**

27           Dated: May 20, 2024

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